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Attorney for:
 Bank of America, N.A., as successor by merger to BAC Home Loans Servicing, LP fka
 Countrywide Home Loans Servicing LP, its assignees and/or successors, and the servicing agent
 Bank of America

UNITED STATES BANKRUPTCY COURT
 DISTRICT OF NEVADA

In re) Case No. 11-20458-BAM
)
)
Joshua D. Kerns,) Chapter 13
)
Debtor.)
) OPPOSITION TO DEBTOR'S MOTION
) TO VALUE COLLATERAL
)
) Hearing:
) Date: 12/8/2011
) Time: 3:15 p.m.
) Ctrm: 1
) Place: 300 Las Vegas Blvd., South
) Las Vegas, NV 89101

BANK OF AMERICA, its assignees and/or successors, "Respondent" in the above-
 entitled Bankruptcy proceeding, hereby submits the following Opposition to Motion to Value
 Collateral proposed by Debtor, Joshua D. Kerns.

STATEMENT OF FACTS

1. This objecting Respondent holds a Promissory Note, which is secured by a First
 Deed of Trust on the subject property commonly known as 5426 Spencer Street, Las Vegas, NV
 89119 ("Property").

3. The Debtor states that this account is the first deed of trust, in the amount of \$216,000.00, and also states that it is wholly unsecured, in spite of the Property's value of \$72,033.00.

5. Therefore, the Debtor's motion appears to suffer from at least two typographical errors, which Bank of America wishes to clarify. First, Bank of America's lien ending in number 3148 should be properly identified. Second, it should not be called "wholly unsecured." Third, it should not be stripped.

Accordingly, Bank of America respectfully requests that this motion be denied, or alternatively, that the motion be continued and the Debtor be required to amend the motion to correct the above-referenced errors.

McCarthy & Holthus, LLP

2

CERTIFICATE OF SERVICE

On 12/7/2011, I served the foregoing documents described as **RESPONSE TO MOTION TO VALUE COLLATERAL** on the following individuals by electronic means through the Court's ECF program

DEBTOR(S) COUNSEL

George Haines
ghaines@hainesandkrieger.com

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Donald Byrn

Donald Byrn

On 12/6/2011, I served the foregoing documents described as **RESPONSE TO MOTION TO VALUE COLLATERAL** on the following individuals by depositing true copies thereof in the United States mail at San Diego, California, enclosed in a sealed envelope, with postage paid, addressed as follows:

DEBTOR(S)

Joshua D. Kerns, 5426 Spencer Street, Las Vegas, NV 89119

JUDGE'S COPY

The Honorable Judge, Bruce A. Markell, United States Bankruptcy Court - Southern Division, Foley Federal Building, United States Courthouse, 300 Las Vegas Boulevard South, Las Vegas, NV, 89101

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ David Fry

David Fry